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7  
8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

10  
11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 MICHAEL RICHARD LYNCH AND  
STEPHEN KEITH CHAMBERLAIN

15 Defendants.  
16

CASE NO. 3:18-cr-00577-CRB

**STIPULATION AND [PROPOSED]  
ORDER CLARIFYING  
CONDITIONS OF BOND FOR  
DEFENDANT STEPHEN  
CHAMBERLAIN**

Assigned to Hon. Charles R. Breyer

17 WHEREAS, on November 13, 2019, Defendant Stephen Chamberlain's Ex  
18 Parte Application to Clarify Conditions of Bond came on for hearing. At the  
19 hearing, the Court stated that it was willing to modify the bond language and  
20 requested that the parties submit a stipulation with language that would address the  
21 respective parties' interests;

22 WHEREAS, this is a complex proceeding which is likely to have a lengthy  
23 post-indictment time period;

24 WHEREAS, in addition to assisting with his defense and honoring his  
25 responsibilities to the Court, Mr. Chamberlain has an interest in maintaining gainful  
26 employment and honorably performing his work duties. This includes being able to  
27 attend work meetings and work productively while he is in the United States;

28 WHEREAS, the United States has an interest in minimizing its oversight

1 burdens while Mr. Chamberlain is in the United States;

2 THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE:

3 When Mr. Chamberlain seeks to travel to the United States for Court and/or  
4 for legal defense preparation work, the United States will make good-faith efforts to  
5 assist in obtaining permission for him to do so; and

6 Nothing in the bond order limits Mr. Chamberlain's ability to engage in non-  
7 legal work, including to attend work-related meetings, so long as (i) travel to  
8 locations outside of California is disclosed to the United States in advance of travel,  
9 and (ii) if the United States objects in writing to counsel for Mr. Chamberlain that  
10 such travel would involve an undue burden on the United States, such travel to other  
11 states will not be permitted without prior Court approval.

12 **IT IS SO STIPULATED.**

13 DATED: December 11, 2019 BIRD, MARELLA, BOXER, WOLPERT,  
14 NESSIM, DROOKS, LINCENBERG &  
15 RHOW, P.C.

16 By: /s/ Gary S. Lincenberg  
17 Gary S. Lincenberg  
18 Attorneys for Defendant Stephen Keith  
19 Chamberlain

20 DATED: December 11, 2019 DAVID L. ANDERSON  
21 United States Attorney

22 By: /s/ Robert S. Leach  
23 Robert S. Leach,  
24 Assistant United States Attorney  
Attorneys for United States of America

25 **IT IS SO ORDERED.**

26 DATED: THE HONORABLE CHARLES R. BREYER  
27 United States District Judge  
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